

Exhibit E

**UNITED STATES DISTRICT
COURT NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases

MDL No. 2804

Case No. 17-md-2804 Judge

Dan Aaron Polster

**PLAINTIFFS' REQUEST TO THE MANUFACTURER DEFENDANTS
FOR THE PRODUCTION OF DOCUMENTS CONCERNING DEONENTS**

Pursuant to Rules 30(b)(2) and 34 of the Federal Rules of Civil Procedure¹, Plaintiffs request that each Manufacturer Defendant² produce the documents and things described herein on a rolling basis on a schedule to be agreed upon by the parties to ensure production at least three business days in advance of the relevant deposition of a current or former employee of a Manufacturer Defendant.

DEFINITIONS

“You” or “Your” means each of the Manufacturer Defendants, respectively.

¹ By serving this notice, Plaintiffs do not concede that this request is necessary, including in light of their prior requests for production and interrogatories, including specifically Plaintiffs' Interrogatory to the Manufacturer Defendants 25 and Plaintiffs' Requests for Production to the Manufacturer Defendants 25-28. However, to avoid unnecessary disputes and further delay, Plaintiffs also have volunteered to seek this discovery pursuant to this formal request under Rules 30(b)(2) and 34.

² Manufacturer Defendants are: Purdue Pharma LP, Purdue Pharma Inc., and The Purdue Frederick Company Inc. (“Purdue”); Allergan Finance, LLC f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc. (“Allergan/Actavis”); Watson Laboratories, Inc., Actavis Pharma, Inc., Actavis LLC, Teva Pharmaceuticals, USA, Inc., and Cephalon, Inc. (“Teva”); Johnson & Johnson (“J&J”); Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen Pharmaceuticals, Inc., and Janssen Pharmaceutica, Inc. (“Janssen”); Endo Health Solutions Inc. and Endo Pharmaceuticals Inc. (“Endo”); Insys Therapeutics, Inc. (“Insys”); and Mallinckrodt LLC (“Mallinckrodt”), and each of their respective foreign or domestic parents, subsidiaries, affiliates, predecessors, and successors, as provided in the operative Complaints.

INSTRUCTIONS

All electronically stored information (“ESI”) shall be produced in its original native form, including all metadata, and shall be subject to the provisions of the agreed-upon ESI protocol.

REQUEST FOR PRODUCTION

For each of Your current or former employees testifying at deposition in this proceeding (“Witness”):

- a. All reviews, evaluations, or assessments of the Witness’s job performance related specifically to Opioid marketing and sales while employed by You, including the Witness’s self- or peer- reviews, evaluations, or assessments.
- b. All records of any admonitions or other discipline while the Witness was employed by You to the extent the discipline related to (1) Opioid sales and marketing and/or (2) compliance with federal or state laws or regulations governing the sale, marketing, or distribution of drug products.
- c. Documents sufficient to show the bases and nature of any awards, recognitions, or honors relating to the sale, marketing, or distribution of Opioids bestowed on the witness while the witness was employed by You.
- d. All attestations concerning corporate integrity, ethics, Opioids, or compliance with federal or state laws or regulations governing the sale, marketing, or distribution of drug products made by the Witness in connection with the Witness’ employment by You.
- e. Documents sufficient to show the bases and amount of the annual salary for the Witness while employed by You.
- f. Documents sufficient to show the bases and amount, on an annual basis, of any bonuses, other compensation, or other incentives related to Opioid marketing or sales provided to the

Witness while employed by You.

Dated: November 7, 2018

s/ Jennifer R. Scullion

Jennifer R. Scullion
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of November, 2018, the foregoing has been served via email to counsel for each of the Manufacturer Defendants via the designated listserve.

s/ Jennifer R. Scullion

Jennifer R. Scullion
Seeger Weiss LLP